

Sarah J. Crouch, Esq. (SC 1174)
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649 Newark Avenue
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United States Bankruptcy Court
District of New Jersey -- Newark

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In Re:

SUSAN MAQUILING

Chapter 13

Debtor

Case No. 18-27312
Hon. Stacey L. Meisel

Hearing Date:
Time: 10:00 AM

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OPPOSITION TO REQUEST OF TERMINATION OF LOSS MITIGATION

I, Sarah J. Crouch, Esq., counsel for the above named debtor,
hereby certify as follows:

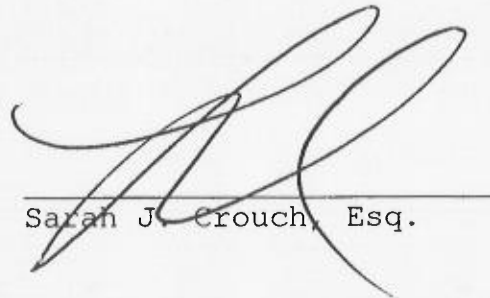
1. I make this certification in opposition to the Creditor's Application for Early Termination of Loss Mitigation.
2. The Application for Early Termination of Loss Mitigation filed by counsel states that the Loss Mitigation package has not been submitted to the loss mitigation portal since the reinstatement of loss mitigation.
3. Loss Mitigation was reinstated on September 1, 2019. On September 4, 2019, my office reached out to the creditor on the loss mitigation portal requesting a list of documents needed to get the loss mitigation application processing again.
4. On September 5, 2019, the creditor provided a list of

the documents needed. On September 5, 2019, my office sent an email to the Debtor advising her to make an appointment right away to complete the packet. The Debtor was also sent a letter on September 19, 2019 requesting that she make an appointment to come in and complete the application.

5. It has been less than a month since loss mitigation has been reinstated. The debtor needs additional time to finalize this application for submission. The Debtor does not wish to submit an incomplete application at this time as that only causes further delay in the processing of the application.
6. Accordingly, it is respectfully requested that the Request to Terminate Loss Mitigation be denied.

I certify under penalty of perjury that the foregoing information is true and accurate to the best of my information and belief.

Dated: September 24, 2019



Sarah J. Crouch, Esq.